

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ANNE WHITNEY COLLINS,

Plaintiff

v.

EASTERN UNIVERSITY

Defendant

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: CIVIL ACTION NO. 2:23 - cv -02693
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:
:
: JURY TRIAL DEMANDED

**JOINT STIPULATION AND REQUEST TO WITHDRAW
PLAINTIFF'S REQUEST FOR ENTRY OF DEFAULT**

Plaintiff, Anne Whitney Collins ("Plaintiff"), and Defendant, Eastern University ("Eastern"), (together, the "Parties"), enter into this Joint Stipulation and Request to Withdraw Plaintiff's Request for Entry of Default. Plaintiff filed her Complaint on July 14, 2023. [ECF Dkt. No. 1]. Plaintiff issued Eastern a Waiver of Service on July 20, 2023 and Eastern returned the signed Waiver of Service on July 31 which was filed with the Court on August 1, 2023. [ECF Dkt. No. 3]. Plaintiff filed a Request for Entry of Default against Eastern on September 27, 2023 [ECF Dkt. 4]. On like date, Eastern filed its Answer with Affirmative Defenses [ECF Dkt. No. 5].

The Parties have agreed to enter into the Joint Stipulation to withdraw Plaintiff's Request for Entry of Default and also to the acceptance and filing of Eastern's Answer with Affirmative Defenses which will allow the matter to timely proceed on its merits. Accordingly, the Parties file this Joint Stipulation and respectfully request that the Request to Enter Default Judgment be withdrawn in accordance with the attached Order.

Dated: September 29, 2023

Respectfully submitted,

/s/ Jennifer Myers Chalal

/s/ Glenn R. Davis

Jennifer Myers Chalal, Attorney
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**SPECTOR, GADON & ROSEN,
P.C.**

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Counsel for Defendant

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ORDER

AND NOW, this ____ day of September 2023, upon consideration of counsels' Joint Stipulation and Request to Withdraw Plaintiff's Entry of Default (Doc. 4), IT IS HEREBY ORDERED the Joint Stipulation and Request is GRANTED.

IT IS SO ORDERED.

J.